

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**
Caption in compliance with D.N.J. LBR 9004-1(b)

McCARTER & ENGLISH, LLP

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Attorneys for St. Joseph's University Medical Center Inc.

In re:

NEW ENGLAND MOTOR FREIGHT, INC., *et al.*,

Debtors.

KEVIN P. CLANCY, solely in his capacity as the
LIQUIDATING TRUSTEE,

Plaintiff,

v.

ST. JOSEPH'S UNIVERSITY MEDICAL
CENTER INC.,

Defendant.

Chapter 11

Case No.: 19-12809 (JKS)

(Jointly Administered)

Adv. Pro. No.: 21-01116 (JKS)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Deirdre Burke of McCarter & English, LLP, hereby enters her appearance in the above-captioned case in accordance with Fed. R. Bankr. P. 9010(b) for St. Joseph's University Medical Center Inc. ("St. Joseph's"). Request is made that the documents filed

in this case and identified below be given and served upon the following person at the address, telephone, facsimile number and e-mail address indicated below:

McCARTER & ENGLISH, LLP

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DOCUMENTS:

- All notices entered pursuant to Fed. R. Bankr. P. 2002.
- All documents and pleadings of any nature.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended to waive St. Joseph's (i) right to have final orders in non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) right to a jury trial in any proceeding so triable herein, or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by a United States District Court Judge in any matter subject to mandatory or discretionary withdrawal, including proceedings over which the Bankruptcy Court lacks constitutional authority to enter final judgments; or (iv) other rights, claims, defenses, setoffs or recoupments to which St. Joseph's is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Date: March 10, 2021
Newark, NJ

McCARTER & ENGLISH, LLP

By: /s/ Deirdre Burke
Deirdre Burke

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